

October 11, 2015

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Calfee,

As a practicing paleontologist, I thank your team for improving CEQA guidelines. I understand the rationale for the separation of Paleontological Resources from Cultural (archaeological) Resources as presented in Assembly Bill 52. However, Paleontological Resources and the management thereof, deserves a separate and equal section comparable to that of Cultural Resources.

Like Cultural Resources, Paleontological Resources are quantifiable, and have distinct criteria for management. Paleontological Resources do not deserve to be placed into the general category of "Open Space, Managed Resources, and Working Landscapes." In fact, placing Paleontological Resources in the section on "Open Space Managed Resources, and Working Landscapes" hides the discussion of Paleontological Resources. The Paleontological Resources section should receive a standalone status separate but equal to that of Cultural Resources. If tucked away in "Open Space...." it may signify to federal reviewers that California has not conducted adequate review or consideration of such resources

Please ask the professional paleontological community for a clear description and understanding of paleontological resources that can be accurately portrayed in CEQA. I strongly recommend adding a new category specifically for paleontological resources since they are uniquely different from other resources. Existing language to fulfill the AB 52 requirements can be found in Federal and State citations, available upon request. Please also research the following:

Society of Vertebrate Paleontology

- 1995 Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. SVP News Bulletin No. 163:22-27.
- 1996 Conditions of receivership for paleontologic salvage collections. SVP News Bulletin No. 166:31-32.

2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to
Paleontological Resources

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert E. Reynolds".

Robert E. Reynolds, Chair
SVP Impact Mitigation Guidelines Revision Committee